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GOLDEN GATE BRIDGE HIGHWAY AND
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Attorneys for Third-Party Defendant
ROLLS-ROYCE NAVAL
MARINE, INC. as successor to
BIRD JOHNSON

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

GOLDEN GATE BRIDGE HIGHWAY
AND TRANSPORTATION DISTRICT, a
public entity; and LEXINGTON
INSURANCE COMPANY, a corporation,

Plaintiff,

vs.

BLUE AND GOLD FLEET, INC., a
California corporation; BLUE AND GOLD
FLEET, L.P., a Delaware limited
partnership,

Defendants.

Case No.: C10-2387 SC

**STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME
TO COMPLETE ADR PROCESS**

WHEREAS pursuant to the Court's Order Selecting ADR Process, dated August 24,
2010, the parties currently have until January 21, 2011 to complete mediation;

WHEREAS Blue & Gold Fleet, LP filed a Third Party Complaint against Rolls Royce Naval Marine, Inc., Bird-Johnson Company, and Sound Propeller Services on September 3, 2010;

WHEREAS Third-Party Defendant Sound Propeller Services has not yet appeared in the case;

WHEREAS the parties agree that the deadline to complete the ADR process should be continued so as to allow more time for all parties to appear and – hopefully – engage in settlement discussions;

IT IS HEREBY STIPULATED and agreed that the date by which to complete mediation shall be extended three months from January 21, 2011, to April 22, 2011.

DATED: January 14, 2011 COZEN O’CONNOR

By /s/ Kevin D. Bush
Kevin D. Bush
Attorneys for Plaintiffs GOLDEN GATE BRIDGE
HIGHWAY AND TRANSPORTATION DISTRICT and
LEXINGTON INSURANCE COMPANY

DATED: January 14, 2011 EMARD DANOFF PORT TAMULSKI & PAETZOLD LLP

By /s/ Talcott N. Bates
James J. Tamulski
Talcott N. Bates
Attorneys for Defendant and Third-Party Plaintiff BLUE &
GOLD FLEET, LP

DATED: January 14, 2011 LECLAIRRYAN LLP

By /s/ Peter M. Hart
Peter M. Hart
Attorneys for Third-Party Defendant ROLLS-ROYCE
NAVAL MARINE, INC. as successor to BIRD JOHNSON

CERTIFICATE OF SIGNATURES

I, Talcott N. Bates, attest that the content of this document is acceptable to Kevin D. Bush and Peter M. Hart, and that they authorized me to sign the document on their behalf.

By /s/ Talcott N. Bates
Talcott N. Bates

ORDER

Good cause appearing therefore, IT IS HEREBY ORDERED THAT:

The date by which to complete mediation shall be extended three months from January 21, 2011, to April 22, 2011.

DATED: 1/18/11

By _____

